

September 5, 2019

**LETTER  
FILED VIA ECF**

Hon. Ramon E. Reyes Jr.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

RE: **Case 1:19-cv-03156 - Golden v. Michael Grecco Productions, Inc. et al**

Dear Judge Reyes,

I represent and write on behalf of Defendants Michael Grecco and Michael Grecco Productions Inc. ("Defendants") in the above-referenced action to request an adjournment of the Initial Discovery Planning Conference scheduled for September 11, 2019 at 10:30 am in Your Honor's courtroom by 30 days or to a time that is convenient for the Court. Due to the fact the Defendants have alleged counterclaims in their pleading filed on August 16, 2019, Plaintiff will not be required to file its Answer to those Counterclaims until September 5, 2019, just a few days before the conference, and the same day in which the Case Management must be submitted. At this time, without knowing how Plaintiff intends to respond to the counterclaims, or whether and to what extent Plaintiff will raise affirmative defenses, it would be difficult for the Defendants to accurately estimate the appropriate dates that should be put into the Case Management Plan.

All parties consent to the filing of this request and Plaintiff's counsel has stated that it does not oppose the requested 30 day adjournment. No party has previously requested an adjournment of the conference. This request would not affect any other scheduling dates.

Thank you in advance for your attention to and consideration of this matter.

Sincerely,

**/s Rayminh L. Ngo**  
Rayminh L. Ngo, Esq.  
*Attorney for Plaintiff*